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Re: Motion to Add Crucial Evidence - OCR Investigation and Retaliation under Title IX and Title VI

Dear Judge Paul S. Diamond,

I hope this letter finds you in good health. I am writing to submit a formal motion to introduce crucial evidence into the ongoing case before your honorable court. This evidence pertains to an investigation conducted by the Office for Civil Rights (OCR) into the Athena Center and the Athena Film Festival, as well as allegations of retaliation under Title IX and Title VI.

I. Background

This case centers on issues of discrimination and unequal enforcement of Title IX and Title VI in the context of certain colleges transitioning from single-sex institutions to LGBTQIA-inclusive colleges. My initial complaint to OCR highlighted concerns regarding programs at the Athena Center and the Athena Film Festival that originally admitted only women and non-binaries, potentially violating Title IX and Title VI.

II. OCR Investigation and Retaliation Allegations

Subsequent to my complaint, OCR initiated an investigation into the Athena Center and the Athena Film Festival. As a result of this investigation, both programs have now opened their doors to individuals of all gender identities and sexual orientations, aligning with the requirements of the law.

However, my participation in a screenwriting workshop was rejected by Barman, which I believe constitutes retaliation under Title IX and Title VI. This retaliation is a matter of grave concern and a potential violation of my rights as a complainant.

III. Motion to Add Evidence

I respectfully request the court's permission to add the evidence related to OCR's investigation findings and the allegations of retaliation under Title IX and Title VI to the evidentiary record of this case. These documents are crucial to understanding the background and context of this matter and will provide clarity regarding the actions taken to address the initial complaint.

IV. Rationale

1. The OCR investigation findings demonstrate that my initial complaint regarding discrimination had merit and led to corrective actions in accordance with Title IX and Title VI.
2. The allegations of retaliation are relevant in assessing the overall impact of the complaint process and whether my rights under Title IX and Title VI were upheld.

Legal Precedent

The investigation conducted by the Office for Civil Rights (OCR) and their enforcement of Title IX against Barnard College set a significant legal precedent. This precedent, established by OCR, must be followed at all programs, including all undergraduate admissions, at all colleges and educational institutions.

OCR's investigation and the subsequent actions taken in response to the initial complaint at Barnard College demonstrated a commitment to upholding the principles of non-discrimination and equal protection under Title IX. This legal precedent must be applied consistently to ensure uniformity and adherence to federal laws across all educational programs and institutions.

The importance of consistent enforcement of Title IX is underscored by the intent of the Supreme Court's decisions in cases such as *SFFA vs. Harvard* and *SFFA vs. UNC* to end discrimination in educational settings. It is crucial that this legal precedent is recognized and followed to guarantee that all students have equal access to educational opportunities without regard to their gender, sexual orientation, or any other protected characteristic.

Therefore, I respectfully request that the court considers this legal precedent when evaluating the evidence related to OCR's investigation and the allegations of retaliation in this case. Upholding this precedent is not only essential for the resolution of this matter but also for the broader goal of ensuring equality and non-discrimination in education.

Thank you for your attention to this critical aspect of the case.

VI. Conclusion

In the pursuit of justice and adherence to federal laws prohibiting discrimination, it is imperative that this evidence be considered as part of the case record. It highlights the importance of equal enforcement and underscores the intent of the Supreme Court's decisions in cases such as SFFA vs. Harvard and SFFA vs. UNC to end discrimination in educational institutions across the board.

I kindly request that the court consider this motion and grant permission to introduce the evidence related to OCR's investigation and the allegations of retaliation into the evidentiary record of this case.

Thank you for your attention to this matter. I remain committed to ensuring that the principles of equal protection and non-discrimination are upheld.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Samuels". The signature is fluid and cursive, with a large initial "J" and a stylized "S" at the end.

Justin Samuels